

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VANESSA SANDERS,)	
)	
Plaintiff,)	Case No. 08 CV 125
)	
v.)	Judge Robert M. Dow, Jr.
)	
ZURICH AMERICAN INSURANCE CO.,)	Magistrate Judge Morton Denlow
INC.,)	
)	
Defendant.)	

**AGREED MOTION FOR AN EXTENSION OF TIME
FOR DEFENDANT TO ANSWER OR OTHERWISE PLEAD**

Defendant Zurich American Insurance Company, Inc. (“Zurich”), by its attorneys, moves this Court, with the agreement of Plaintiff, for an extension of time until March 21, 2008, to answer or otherwise respond to Plaintiff’s Complaint. In support thereof, Zurich states as follows:

1. On January 7, 2008, Plaintiff filed her Complaint. Zurich waived service by summons. Accordingly, Zurich has until March 10, 2008 to answer or otherwise plead in response to Plaintiff’s Complaint.

2. Plaintiff and Zurich are actively engaged in settlement negotiations and believe that there is a strong possibility that they can resolve this matter.

3. To permit the parties additional time to attempt to settle this matter, Zurich respectfully requests an extension of time, until March 21, 2008, to answer or otherwise plead in response to Plaintiff’s Complaint.

4. Counsel for Plaintiff has no objections to Zurich's request for additional time to answer or otherwise plead with respect to Plaintiff's Complaint. This is Zurich's first request for an extension of time to answer or otherwise plead.

WHEREFORE, for the foregoing reasons, Defendant Zurich American Insurance Company, Inc. respectfully requests an extension of time, until March 21, 2008, to answer or otherwise plead in response to Plaintiff's Complaint.

Respectfully submitted,

**DEFENDANT ZURICH AMERICAN
INSURANCE COMPANY, INC.**

By: /s/ Ami N. Wynne
One of Its Attorneys

Nigel F. Telman
Ami N. Wynne
Sidley Austin LLP
One South Dearborn Street
Chicago, Illinois 60603
(312) 853-7000

Dated: March 10, 2008

CERTIFICATE OF SERVICE

I, Ami N. Wynne, one of the attorneys for Defendant Zurich American Insurance Company Inc., certify that I caused the foregoing Agreed Motion For An Extension of Time For Defendant To Answer or Otherwise Plead to be served by upon counsel for Plaintiff by electronic filing:

George S. Frederick
mkpclaw@aol.com
Mirabella, Kincaid, Frederick & Mirabella, P.C.
1737 S. Naperville Rd., Suite 100
Wheaton, IL 60187

this 10th day of March, 2008.

/s/ Ami N. Wynne